

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

MEMET GEZER, a/k/a

"Muhammad Altrky,"

"Wissam Abdel Rahman Younes,"

"Mohamed Subhe Al Gazar," and

SABER KARIMCH, a/k/a

"Abu Farouk,"

Defendants.

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X

SEALED INDICTMENT

16 Cr.

16 CRIM 282

COUNT ONE

(Narcotics Importation Conspiracy)

The Grand Jury charges:

1. From at least in or about September 2015 up to and including in or about April 2016, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," and SABER KARMICH, a/k/a "Abu Farouk," the defendants, at least one of whom will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, together with others known and unknown, intentionally and knowingly did combine, conspire,

confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," and SABER KARMICH, a/k/a "Abu Farouk," the defendants, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, to wit, five kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Sections 812, 952(a), 960(a)(1) & (b)(1)(B), and 963 of Title 21, United States Code.

3. It was a further part and object of the conspiracy that MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," and SABER KARMICH, a/k/a "Abu Farouk," the defendants, and others known and unknown, would and did distribute a controlled substance, to wit, five kilograms and more of a mixture and substance containing a detectable amount of cocaine, intending and knowing that such substance would be imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in

violation of Sections 812, 959(a), 960(a)(3) & (b)(1)(B), and 963 of Title 21, United States Code.

(Title 21, United States Code, Sections 959(c) and 963;
Title 18, United States Code, Section 3238.)

COUNT TWO

(Narcotics Importation Attempt)

The Grand Jury further charges:

4. From at least in or about September 2015 up to and including in or about April 2016, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," and SABER KARMICH, a/k/a "Abu Farouk," the defendants, at least one of whom will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, intentionally and knowingly did attempt to import into the United States and into the customs territory of the United States from a place outside thereof a controlled substance, in violation of Sections 812, 952(a), 960(a)(1) & (b)(1)(B), and 963 of Title 21, United States Code.

5. The controlled substance involved in the offense was five kilograms and more of a mixture and substance

containing a detectable amount of cocaine, in violation of Sections 812, 960(a)(1) & (b)(1)(B) of Title 21, United States Code.

(Title 21, United States Code, Sections 959(c) and 963;
Title 18, United States Code, Section 3238.)

COUNT THREE

(Narcotics Importation Attempt)

The Grand Jury further charges:

6. From at least in or about September 2015 up to and including in or about April 2016, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," and SABER KARMICH, a/k/a "Abu Farouk," the defendants, at least one of whom will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, intentionally and knowingly did attempt to distribute a controlled substance, intending and knowing that such substance would be imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Sections 812, 959(a), 960(a)(3) & (b)(1)(B), and 963 of Title 21, United States Code.

7. The controlled substance involved in the offense was five kilograms and more of a mixture and substance containing a detectable amount of cocaine, in violation of Sections 812, 960(a)(3) & (b)(1)(B) of Title 21, United States Code.

(Title 21, United States Code, Sections 959(c) and 963;
Title 18, United States Code, Section 3238.)

COUNT FOUR

(Conspiracy to Aid and Abet the Possession of Firearms
in Furtherance of a Drug Trafficking Offense)

The Grand Jury further charges:

8. From at least in or about September 2015 up to and including in or about April 2016, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," and SABER KARMICH, a/k/a "Abu Farouk," the defendants, at least one of whom will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, did combine, conspire, confederate, and agree with others known and unknown to aid and abet the use and carrying of firearms, including machine guns, during and in relation to a drug trafficking offense for which they may be prosecuted in a court of the United States, namely,

the narcotics importation conspiracy charged in Count One and the narcotics importation attempts charged in Counts Two and Three, and, in furtherance of such crimes, the possession of firearms, including machine guns.

Overt Acts

9. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed:

a. On or about October 10, 2015, SABER KARMICH, a/k/a "Abu Farouk," the defendant, met with two DEA confidential sources ("CS-1" and "CS-2" and, together, the "CSes") in a particular country ("Country-1") to discuss supplying them with weapons to protect cocaine shipments to the United States.

b. On or about February 3, 2016, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," the defendant, met with CS-1 in a particular country ("Country-2") to discuss the logistics of supplying CS-1 with weapons to protect cocaine shipments to the United States.

(Title 18, United States Code, Sections 924(o), 2, and 3238.)

COUNT FIVE

(Conspiracy to Launder Money)

The Grand Jury further charges:

10. From at least in or about February 2016 up to and including in or about April 2016, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," the defendant, who will be first brought to and arrested in the Southern District of New York, and whose point of entry into the United States will be the Southern District of New York, and others known and unknown, willfully and knowingly did combine, conspire, confederate and agree together and with each other to violate Sections 1956(a)(3)(A) & (B) of Title 18, United States Code.

11. It was a part and object of the conspiracy that MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," the defendant, and others known and unknown, in an offense involving and affecting interstate and foreign commerce, willfully and knowingly would and did agree to conduct a financial transaction involving property represented by a person, at the direction of and with the approval of a Federal official authorized to investigate and prosecute violations of Section 1956 of Title 18, United States

Code, to be the proceeds of specified unlawful activity, with the intent to promote the carrying on of specified unlawful activity and to conceal or disguise the nature, location, source, ownership, or control of property believed to be the proceeds of specified unlawful activity, to wit, the proceeds of illegal narcotics trafficking.

Overt Acts

12. In furtherance of the conspiracy, and to effect the illegal object thereof, the following overt acts, among others, were committed:

a. On or about February 3, 2016, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," the defendant, met with CS-1 in Country-2, told CS-1 that he (GEZER) had a large quantity of U.S. currency to sell for Euros, and showed CS-1 what appeared to be approximately two million dollars in U.S. currency, which GEZER indicated was a small fraction of what GEZER could make available to the CSes.

b. On or about April 14, 2016, GEZER met with the CSes in a particular country ("Country-3") to discuss selling the U.S. currency referenced in paragraph 12(a) in exchange for Euros represented by the CSes to be the proceeds of the sale of cocaine.

(Title 18, United States Code, Sections 1956(h) and 3238.)

FORFEITURE ALLEGATIONS

13. As a result of committing the controlled substance offenses alleged in Counts One, Two, and Three of this Indictment, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," and SABER KARMICH, a/k/a "Abu Farouk," the defendants, shall forfeit to the United States, pursuant to Title 21, United States Code, Sections 853 and 970, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the said violations and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the violations alleged in Counts One, Two, and Three of this Indictment.

14. As a result of committing the money laundering offense alleged in Count Five of this Indictment, MEMET GEZER, a/k/a "Muhammad Altrky," a/k/a "Wissam Abdel Rahman Younes," a/k/a "Mohamed Subhe Al Gazar," the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property, real and personal, involved in the offense alleged in Count Five of this Indictment and all property traceable to such property.


Substitute Assets Provision


15. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants -

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 21, United States Code, Sections 853(p) and 970, to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982;
Title 21, United States Code, Sections 853 and 970.)


FOREPERSON


PREET BHARARA
United States Attorney

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16 Cr.

(21 U.S.C. §§ 963, 959(c);
18 U.S.C. §§ 924(o), 2, 1956(h), & 3238)

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.
